

# Submission

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## SEPA: Safeguarding Scotland's Water Environment

- NFU Scotland (NFUS) is the leading agricultural organisation in Scotland. Representing more than 9,000 farmers, growers and crofters, our members provide and support thousands of jobs and deliver significant economic, social and environmental benefits across Scotland.
- Agriculture is the lynchpin of rural Scotland and is an important part of Scotland's booming food and drink industry. Scottish agriculture generates a gross output of £4.6 billion annually. The farming and crofting sector is committed to sustainable food production, enhancing biodiversity and helping to tackle climate change.
- NFUS believes River Basin Management Plan 4 will be most effective where it supports collaboration, recognises the economic realities of farming, and delivers environmental improvements through partnership rather than prescription.
- An example of an effective use of this approach would be SEPA's Priority Catchments focus on improving water quality in areas affected by rural pollution. They are based primarily on education and awareness rather than inspection, working collaboratively with farmers to reduce diffuse pollution, protect drinking water, enhance habitats, support biodiversity, and encourage sustainable land management practices.
- A plan that values food production alongside environmental stewardship will be more resilient, more widely supported, and more likely to succeed.

1. To what extent do you agree that we have identified the most significant water management issues affecting Scotland's water environment?

- Rural diffuse pollution – significant progress has been made and there has been an increase in compliance. We support these continued improvements, however we want to see this aligned with future support and policies in the Climate Change Plan. We are due to see more precision/efficiency measures and slurry storage and application rules come into force from January this year and more from January 2027. These regulations and changes must be allowed to bed in before further regulation is proposed.
- NFUS would like to see policy that aligns with other compliance measures farmers and crofters are already compliant with to avoid duplication and support coherent policy asks, such as asks around soil management, nutrient budgeting and buffer strips.
- We welcome actions that will promote multiple benefits for business and the environment, such as protecting the environment and reducing the costs for farmers, protecting yields in the long-term and reducing emissions (e.g. soil management).
- We would be supportive of grants to help land managers make these adjustments to promote multiple benefits, such as for increasing buffer strips.
- River Conditions – grants would be a welcome investment for the agriculture sector to support positive action, though we have some reservations about the inclusion of private investment as a means funding this through carbon credits and developing a new market in biodiversity. Our members have raised concerns in the past regarding private investment on carbon credits due to its nature as a still developing market and concerns surrounding who holds the liability, tax implications and the longterm timescales of these agreements.
- Water use – our members are increasingly concerned with water use and management pressures, and particularly for certain regions of the country.
- We support the proactive management of water resources to better assess future demands against supply risks. Monitoring and metering of abstractions, and a framework for prioritising and allocating water based on efficient use will be tricky and we would need to see more detail on what the framework would look like or how priorities had been set. Members would like to see more forward planning and communication from SEPA regarding this. Cropping particularly, relies on specific water management in order to be productive. While investment by farmers in water management options should be encouraged, such as through capital grant schemes such as water lagoons in FFIS, they will still require some level of abstraction, and water-sensitive crops should be prioritised.
- We support catchment management to store and slow down water, but again, this will require support and a workable framework for collaboration. Peatland restoration is often expensive and the maintenance, long-term. This must be properly considered and supported. We would like to see these aims aligned where possible with wider agricultural ambitions, future support frameworks, policy and asks.

- Chemicals in water – chemical regulatory landscape is complex and we would want to see any further regulation affecting farmers and crofters avoid duplication, and where possibly simplify where they should be compliant. We do not want to see undue regulatory pressure, and farmers and crofters must be able to continue to produce.
- 2. To what extent do you agree that each of the following should be a theme for RBMP4 to support collaboration? (Climate Adaptation, Nature, Health and Wellbeing) (agree, disagree)**
- Strongly agree climate adaptation, nature, agree/neutral health and wellbeing.
- 3. In what ways is river basin management planning currently considered or applied in your work, activities, or community?**
- River Basin Management Planning (RBMP) is currently considered in our work and community primarily through compliance with existing regulatory requirements and participation in agri-environment and water protection schemes. Farmers engage with RBMP objectives through measures linked to cross-compliance, greening, and agri-environment schemes, such as protecting watercourses, managing nutrient applications, maintaining buffer strips, and reducing diffuse pollution risks.
  - At a practical level, RBMP considerations are often applied indirectly rather than through direct engagement with RBMP plans themselves. Guidance and requirements are typically communicated via SEPA regulations, inspections, and scheme conditions.
  - While there is general awareness of water quality objectives, the translation of RBMP goals into farm-level decision-making can be limited by a lack of clear, accessible, and locally specific information. However with increasingly frequent water management issues (flooding/drought) affecting farmers and crofters, RBMP goals will increasingly make up farm-level management/investment decision-making.
  - For farmers and crofters, RBMPs are most visible where they intersect with flood risk management, abstraction controls, and designated water bodies. Greater alignment between RBMP objectives and practical farming realities, alongside improved communication and farmer involvement, would support more effective delivery of outcomes while maintaining productive and resilient agricultural businesses.
- 4. Please share with us examples of participation and engagement which have worked well and could be used for river basin management planning.**
- In Scotland, there are several well-established examples where farmer participation and collaborative engagement at a catchment scale have worked effectively and could inform improvements to River Basin Management Planning (RBMP).

- Organisations such as the Tweed Forum, Dee Catchment Partnership, and Spey Catchment Initiative have demonstrated the value of long-term, locally rooted engagement with farmers and land managers. These partnerships bring together agriculture, regulators, local authorities and environmental organisations to co-design catchment priorities. Farmers are engaged early, on a voluntary basis, and through trusted intermediaries rather than regulatory channels, which has helped build confidence and sustained participation.
- Scottish river trusts, including Ayrshire Rivers Trust, Forth Rivers Trust, and Tay Rivers Trust, have successfully worked with farmers through workshops, demonstration farms and targeted sub-catchment projects. These initiatives often focus on issues such as diffuse pollution, riparian management, and flood mitigation, and are most effective where they support peer-to-peer learning and offer practical solutions rather than prescriptive measures. Farmers value the advisory, non-enforcement-led approach, and uptake is strongest where advice is clearly linked to business resilience as well as environmental benefit.
- In several catchments, farmer engagement has been strongest where RBMP objectives align with natural flood management (NFM) projects. Where land managers are involved in scheme design and compensated appropriately, participation has been positive and has delivered multiple benefits for water quality, soil management and downstream flood resilience. These projects show the importance of recognising the role of productive land management within wider basin planning.

**5. Please share with us examples of where you have used innovative techniques to deliver improvements to the water environment.**

- Please refer to answer above. We would continue to support collaborative, advisory and practically focused approaches to encourage delivery.

**6. Is there anything else you think is important for us to consider when developing RBMP4?**

- From an NFUS perspective, it is essential that RBMP4 recognises the central role farmers and crofters play in managing land and water across Scotland, and that the plan is grounded in practical, deliverable actions that support both environmental outcomes and viable agricultural production.
- RBMP4 should prioritise voluntary and advisory measures wherever possible, building on trusted mechanisms. Regulatory measures should be proportionate, risk-based, and introduced only where there is clear evidence that voluntary approaches have been insufficient.

- RBMP4 must be closely aligned with the evolving agricultural support framework. Water protection measures should be integrated into future support schemes so that farmers are adequately rewarded for delivering outcomes that benefit water quality, flood resilience and climate adaptation, rather than facing additional unfunded requirements.
- Delivering water quality improvements often requires long-term changes to infrastructure, rotations, and land management. RBMP4 should include realistic timelines and transitional support that reflect business planning cycles and regional differences in climate, soils and farm systems.
- Measures should be based on robust, locally relevant evidence and targeted to priority pressures within individual catchments. A “one-size-fits-all” approach risks imposing costs without delivering meaningful improvements. Farmers must have access to clear, accessible data explaining why action is required and what outcomes are expected.
- Farmers and representative organisations must be involved early and meaningfully in the development and delivery of RBMP4. Engagement should move beyond consultation towards genuine co-design, using existing farmer networks and trusted intermediaries to improve understanding and uptake.
- RBMP4 should acknowledge that agricultural activity is not the sole pressure on water bodies. Diffuse pollution, flooding and ecological status are also influenced by urban runoff, wastewater infrastructure, climate change, localised beaver damage and legacy land use. Measures must fairly reflect these cumulative pressures.
- Monitoring should be transparent and proportionate, with clear feedback to land managers on progress and effectiveness. Farmers need confidence that actions taken are making a difference and that improvements are being recognised at both farm and catchment scales.
- NFUS believes RBMP4 will be most effective where it supports collaboration, recognises the economic realities of farming, and delivers environmental improvements through partnership rather than prescription. A plan that values food production alongside environmental stewardship will be more resilient, more widely supported, and more likely to succeed.

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